

Meaning of sudden in sudden and accidental pollution exclusion is undecided in SD

CLAIMS MADE POLLUTION RELATED COVERAGE PLACED WITH PLANET AND RELIANCE INSURANCE FROM 1992-1997. PLANET Insurance AND RELIANCE Insurance ARE INSOLVENT Marsh, Denver : Named Insured (NI): Dakota Mining Corporation - Pollution Legal Liability and Pollution & Remediation Legal Liability/ Pollution Clean Up expires 1/18/95.

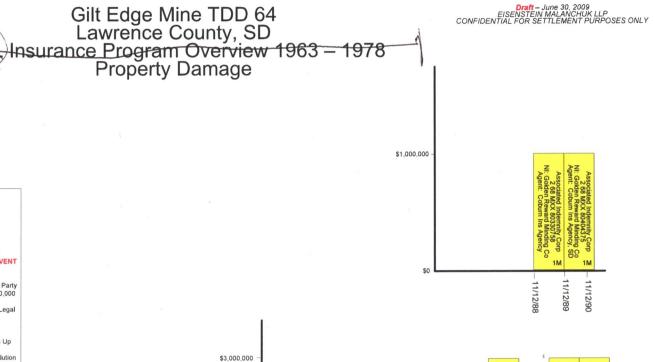
- NI: Minven Gold Corp/Brohm Mining Corp Planet NTD2509514 9/29/92-1/18/94 First Party Pollution Clean Up Coverage LOL \$286,000 (increased to \$306,000 effective 9/29/93) with \$50,000 retention
- NI: Minven Gold Corp/Brohm Mining Corp Planet NTA2509593 1/18/93-94 Pollution Legal Liability LOL \$286,000 with \$50,000 retention
- NI: Dakota Mining Corp Planet NTA250959301 1/18/94 -95 Pollution Legal Liability coverage LOL \$306,000 with \$50,000 retention
- NI: Dakota Mining Corp Planet NTD250951401 1/18/94 -95 First Part Pollution Clean Up coverage LOL \$306,000 with \$50,000 retention
- NI: Dakota Mining Corp Reliance National NTD250951402 1/18/95-96 First Party Pollution Clean Up Coverage LOL \$318,000 with \$50,000 retention
- NI: Dakota Mining Corp Reliance National NTA250959301 1/18/95-96 Pollution Legal Liability LOL \$318,000 with \$50,000 retention
- NI: Dakota Mining Corp Planet NTD250951403 1/18/96-97 First Party Pollution Clean Up Coverage LOL \$500,000 with \$50,000 retention
- NI: Dakota Mining Corp Planet NTA250959303 1/18/96 -97 Pollution Legal Liability coverage LOL \$500,000 with \$50,000 retention
- It looks like Proof of Financial Assurance took the form of \$1M cash deposit sometime in 1995
 - SD Dept of Environment & Natural Resources referred to these policies as "a corporate

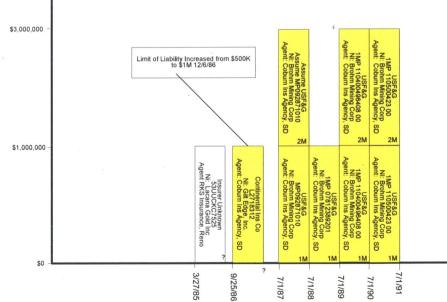
surety

Separate Claims Made Contractors Pollution Liability and Errors & Omissions II Insurance Policy issued to Blattner Holding Company by ACE American Insurance Company COO G23902138 001 (new/not renewal) Effective 3/1/2008 - . Limit of liability \$5M with \$100K SIR. 2/3/2009 Jackie Shafer of Blattner stated Home and Reliance were other insurers at time Blattner was at Gilt Edge Mine Site. Both Reliance and Home are insolvent.

Documentation contained a variety of certificates of insurance with a variety of mine related names as certificate holder. Examples

Insured Hugh M Harris Drilling Co,- Certificate Holder Cyprus Mines (8/28/75-76) Insured Northern Hills Transport - Certificate Holder Gilt Edge Incorporated (3/6/88-89) Insured State Line Improvements - Certificate Holder Brohm Mining (6/21/88-89)





Brohm Palitin 1986 to Gill Edge. Ine Continential Ans. Co./CNA 10H to Colseen one. Lacerna policy -1985 essued 104 to memore agent Reno, NV. C-mail full name time period Dusinos Addus